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MEMORANDUM ENDORSED

December 1, 2023

VIA ECF

The Honorable Gabriel W. Gorenstein
United States Magistrate Judge
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 519
New York, New York 10007

Re: Jason Goodman v. City of New York et al.
Case No.: 1:23-cv-09648-JGLC-GWG

Dear Magistrate Judge Gorenstein:

This firm was retained today to represent the interests of Defendant Adam Sharp ("Sharp") in the above-referenced matter. We respectfully write pursuant to Section 1(E) of Your Honor's Individual Practice Rules to request an extension of time for Sharp to answer, move or otherwise respond to the Complaint.

Sharp was purportedly served with the Complaint on or about November 10, 2023, making his response due December 1, 2023. We respectfully request a thirty (30) day extension of time, up to and including January 2, 2024, for Sharp to answer, move or otherwise respond to the Complaint to allow the undersigned to fully investigate this matter and prepare Sharp's response.

This is Sharp's first request for an extension of time to answer, move or otherwise respond to the Complaint and does not impact any other currently scheduled dates. The undersigned contacted Plaintiff today, November 30, 2023, to inquire whether Plaintiff consents to this request. Plaintiff advised: "I will do nothing from now until the end of time to assist Mr. Sharp in any way until he reverses the despicable things he has done to me." The undersigned believes this objection to be without merit for the reasons stated herein.

By making this request, Sharp does not waive any rights or defenses which may be available to him in connection with this matter.

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We thank Your Honor in advance for consideration of this request. Should Your Honor have any questions or require additional information, please do not hesitate to contact the undersigned.

Respectfully Submitted,

GORDON REES SCULLY MANSUKHANI, LLP

/s/ John Mills


John T. Mills, Esq.

JTM:

CC: All parties via ECF

Good cause having been shown for the extension under Fed. R. Civ. P. 6(b)(1), the plaintiff's objection is overruled. An extension to January 2, 2024, is granted.

So Ordered.



GABRIEL W. CORENSTEIN
United States Magistrate Judge
December 1, 2023